



*State of New Jersey*

Chris Christie  
*Governor*

Office of the Attorney General  
Department of Law and Public Safety  
Division of Gaming Enforcement  
1300 Atlantic Avenue  
Atlantic City, NJ 08401

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*Lt. Governor*

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*Acting  
Director*

December 22, 2011

N. Lynne Hughes, Esq.  
Vice President Legal Affairs & Chief Legal Officer  
Caesars Entertainment, Eastern Division  
c/o Bally's Atlantic City  
Park Place and the Boardwalk  
Atlantic City, NJ 08401

Dear Ms. Hughes:

The staff of the Division of Gaming Enforcement's Regulatory Enforcement Bureau has reviewed Petition # 3361101 filed by Harrah's Atlantic City Operating Company, LLC (Harrah's) dated December 2, 2011 and a supplement letter dated December 14, 2011 requesting to amend Petition #3361101. Harrah's is seeking approval to amend its Certificate of Operation to reflect an expansion of the casino floor by converting a portion of the area known as "The Loft" within "The Pool" at Harrah's into casino floor space.

Harrah's is currently operating under a Certificate of Operation, which was approved in Petition # 1751102 (PCO-58) on June 29, 2011 by the Division of Gaming Enforcement.

By Petition #3361101, Harrah's seeks approval to complete the following modifications to The Pool area known as The Loft, as depicted on PCO-59, dated November 10, 2011, Project # 1103.15 and a revised print labeled PCO-59 prepared by Michael Demling Associates, License #08676.



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**The petitioner proposes the following;**

1. The designation of The Loft within The Pool as casino floor space and increasing the casino square footage by 2,752 square feet.
2. Add six (6) Blackjack tables to Pit 10 in the newly created gaming area known as The Loft within The Pool.
3. Add a Chip Redemption Booth #7 in The Loft area inclusive of (a) Two sets of lockable cashier drawers; (b) manually triggered silent alarms; and (c) CCTV cameras.
4. Install two (2) dance cages near the railing in Pit 10.

**The summary of the statistical calculations is as follows:**

1. No change in slot machine totals. The total number of slot machines remain at **2,874**.
2. An addition of (6) tables games. The new total is **205** table games.
3. The gaming area has changed with an increase of **2,752** sq. ft. for Loft gaming for a new total of **180,322** sq. ft. (**179,753**) sq. ft. casino area and **569** sq. ft. casino simulcast area.)
4. The allowable slot coverage (90% of 180,322 ft.) is **162,290** ft.
5. The actual slot coverage is **106,131** sq. ft., which is **59.00%** of the total gaming area and within the allowable 90% for slot density.

The petitioner has indicated that they will not be seeking to amend their CHAB license with the additional 2,752 square feet of gaming space in The Loft. The petitioner as represented that as per normal operation, alcohol will be served from The Loft bar (Type II). There will be booths along the perimeter where guest can purchase cocktails, beer and bottles, as well as a walk up area around The Loft bar for guests. The Loft bar will be open to non-gamers so they can purchase alcohol and watch games, televisions or dance. The Pool lounge servers will serve drinks to the guests playing at table games. Guests will be responsible to pay for all drinks. Harrah's will not comp guests playing at the tables unless a "hard comp" is issued.

Based on the Division's authority the requested amendments to the Harrah's Certificate of Operation as set forth above, are hereby granted pursuant to N.J.A.C. 13:69C7.1, et seq. This approval authorizes a casino room containing and consisting of **180,322** square feet of total gaming space, **205** table games, **2,874** slot machines and slot

**180,322** square feet of total gaming space, **205** table games, **2,874** slot machines and slot stools, **1** Keno booth with **3** terminals, **23** gaming voucher redemption machines and **4** Self Service Pari-Mutuel Machines (STANS) as referenced in the Petitioners letter.

Please note that although the blueprint depicts areas of the gaming floor as smoking and nonsmoking, the designation of smoking areas in casinos is subject to the jurisdiction of the NJ Department of Health and Senior Services and the Atlantic City Department of Health and Human Services, not the Division. Accordingly, this letter should in no way be construed as approving areas of the gaming floor for smoking.

**This approval is subject to the following conditions:**

A. The revised operational blueprints, reflecting the changes approved herein, inclusive of any deficiencies noted, be submitted to the Division's Regulatory Enforcement Bureau, casino licensee's security podium and the casino licensee's CCTV monitoring room;

B. All gaming chips be transported to and from the gaming tables in accordance with N.J.A.C. 13:69D-1.22 and 1.23;

C. A revised Table Game, Roulette Wheel and Big Six Wheel inventory lists are submitted to the division;

D. All steps necessary and appropriate to ensure maximum patron comfort and safety during the period of renovation are taken;

E. The procedures detailed in the Slot Procedures Manual are followed during the movement of slot machines;

F. A revised Slot Master List is submitted to the Division;

G. Updated security and surveillance submissions are approved by the Division reflecting new table game drop routes, chip fill and credit routes, card distribution routes and staffing of security in The Loft gaming area **prior to the opening of Pit 10.**

H. Harrah's notifies the Division immediately in the event of any modification to the approvals granted herein;

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I. Harrah's comply with all requirements and conditions appended to approvals received from all involved agencies of government whose approvals are required in order for a Certificate of Occupancy for the general public to be issued including, but not limited to, the Department of Community Affairs and the local construction official;

J. An Entertainment submission is to be filed prior to the opening of The Loft gaming area for the dances in Pit 10; and

K. Once modifications have been completed, a satisfactory inspection and approval by the Division is required to ensure the changes made conform to the petition. The review also includes but is not limited to, an assessment of the adequacy of CCTV and security coverage. Such inspection must be done **prior to the proposed areas being used for gaming activity.**

To schedule the inspection, please contact the Division at 441-7529.

If you have any questions, please do not hesitate to contact me at 441-7557.

Sincerely,



Don Errera, Deputy Chief  
Regulatory Enforcement Bureau

cc BEL/  
DGE Intake  
Chuck Kimmel, DAG  
O-12-11-100